

REMARKS

Claims 24 to 45 were pending in this application. In the Office Action of July 13, 2005, claims 23 to 45 were rejected. Applicants thank Examiner for examination. Applicants have herein added claim 46. Applicants request reconsideration of all pending claims and address Examiner's comments below.

Claims 24, 25, 27, 28, 30-32, 34, 35, 37, 39, 40, 42, 43, and 45 have been rejected under 35 U.S.C. § 102(b) as being unpatentable over U.S. Patent No. 5,398,336 (Tantry). This rejection is respectfully traversed. In general, claim 24 is directed to generating a mapping of events occurring at different types of data source equipment around a global supply chain, whereas Tantry merely inputs and processes user interactions with a relational database that uses objects to represent entities of a local factory floor. Thus, while claim 24 configures event response with a map, Tantry merely responds to user interactions by assuming that configuration already exists.

More specifically, claim 24 is directed to a system in a supply chain network, the system comprising:

- one or more site data appliances comprising one or more types of data source equipment, the one or more site data appliances using a protocol to collect specification information, including event information, from the one or more types of data source equipment;
- one or more site servers coupled to one or more site data appliances to gather the specification information from the one or more site data appliances; and
- a data center coupled to the one or more site servers to generate a mapping of the event information to event handlers for execution in response to an event.

Advantageously, the system of claim 24 can generate execute event handlers associated with the data handlers, even when data source equipment varies in type. The event information is sent from a site data appliance to a site server, and then mapped by the data center to event handlers.

Generally, Tantry discloses an object oriented factory floor management system that models factory floor entities as objects in a relational database. (See 2:9-14). Tantry discloses a

first user interacting with the system through an X-terminal and a second user interacting with the system through a bar code reader. Tantry discloses an Application Engine to generate application requests to Application Servers based on the user interactions. Tantry discloses a Communication Manager to coordinate interprocess communication between Application Servers making application requests (e.g., queues multiple requests directed at a single node). (12:65-68). Tantry discloses that the Application Servers make database requests to manipulate data in a relational database that is representative of the factory floor entities.

However, Tantry fails to disclose teach or suggest the limitations of claim 24. First, Tantry fails to disclose the site data appliances as recited. The Office Action states that Tantry discloses the site data appliance as a combination of multiple bar code readers connected to a Communication Manager. Whereas the site data appliance collects specification information from the data source equipment, Tantry merely discloses the collection of user interaction data. The Tantry user interaction data allows a user to initiate manipulations in the database, and assumes compatibility between the end system (X-terminal or bar code reader) with the database system since the system is described as operable without detailing specifics of configuration. This user interaction data of Tantry is unrelated to specifications of various data source equipment collected in claim 24. Furthermore, the Communication Manager is disclosed as managing interprocess communications (e.g., queuing requests), not collecting specification information. Finally, Applicants point out that there is only one bar code reader shown in FIG. 6 of Tantry, although the Office Action describes Tantry as disclosing multiple bar code readers.

Tantry also fails to disclose the site server as recited in claim 24. The Office Action states that the Tantry discloses the site server with the Application Server. While the site server of claim 24 gathers specification information from the site data appliances, the Application Servers of Tantry merely processes application requests into database requests. Again, the described operation of Application Servers in Tantry assumes a preexisting response for each request. Thus, there is no need for Tantry to gather specification information associated with various types of data source equipment.

Tantry also fails to disclose a data center as recited in claim 24. The Office Action states that Tantry discloses the data center with the database. Rather than generating mapping event information to specification event handlers for execution in response to an event as recited in

claim 24, the Tantry database merely processes database requests derived from user interactions. As discussed above, Tantry assumes a preexisting configuration of database requests to actions, and performs the actions without disclosing any generation of a map between a certain database request and a certain action.

Therefore, Applicant respectfully submits that independent claim 24 is patentable over Tantry, and in condition for allowance. It follows that claims dependent on claim 24, having additional limitations, are patentable over Tantry for at least the same reasons as claim 24. Similarly, independent claims 31 and 39, and related dependent claims, to the extent that they contain similar limitations to claim 24, are patentable for at least the same reasons as claim 24.

Claims 26, 29, 33, 36, 38, 41, and 44 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Tantry. Examiner has taken Official Notice that XML and dotted notation are well known and it would be obvious to use them to take advantage of standardized methods. No references have been provided as evidence of motivation to combine the use of XML in combination with the recited limitations of the claims. Furthermore, one advantage of using XML is to make the Description Document human-readable which reaches beyond mere standardization. If Examiner persists in this rejection, Applicants kindly request that it be supported by a reference showing all of the claim limitations and motivation to combine the use of XML.

CONCLUSION

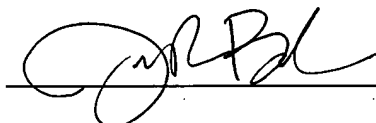
In sum, Applicant respectfully submits that claims 24-46, as presented herein, are patentably distinguishable over the prior art of record. Therefore, Applicants request reconsideration and allowance of these claims.

In addition, Applicant respectfully invites Examiner to contact Applicants' representative at the number provided below if Examiner believes it will help expedite furtherance of this application.

Respectfully submitted,
DOOLEY, ET AL.

Date: October 13, 2005

By: _____



Jennifer R. Bush, Reg. No. 50,784
FENWICK & WEST LLP
801 California Street
Mountain View, CA 94041
Phone: (650) 335-7213
Fax: (650) 938-5200